

KRUTHAM SA (PTY) LTD

("KRUTHAM")

MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF

THE PROMOTION OF ACCESS TO INFORMATION ACT NO. 2 OF 2000 (as amended)

Contents

1	INTRODUCTION	3
2	DEFINITIONS.....	3
3	SCOPE OF THE MANUAL.....	5
4	OVERVIEW OF THE FUNCTIONS OF KRUTHAM.....	6
5	CONTACT DETAILS	6
6	HOW TO USE PAIA TO ACCESS INFORMATION.....	7
7	PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA.....	9
8	DATA GOVERNANCE POLICIES	ERROR! BOOKMARK NOT DEFINED.
9	INFORMATION HELD BY KRUTHAM IN TERMS OF PAIA.....	13
10	INFORMATION KEPT IN ACCORDANCE WITH OTHER LEGISLATION	15
11	REQUEST PROCEDURES.....	16
12	TIMELINES FOR CONSIDERATION OF A REQUEST.....	18
13	GROUND FOR REFUSAL OF ACCESS TO RECORDS.....	19
14	REMEDIES AVAILABLE TO A REQUESTOR ON REFUSAL OF ACCESS.....	21
15	OTHER INFORMATION HELD BY KRUTHAM AS PRESCRIBED.....	21
16	AVAILABILITY OF THE MANUAL.....	21

ANNEXURES

ANNEXURE "A" – FORM C – PRESCRIBED FORM TO MAKE REQUEST FOR ACCESS

1 INTRODUCTION

- 1.1 This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act No.2 of 2000, as amended ("**PAIA**").
- 1.2 The aim of the Manual is to assist potential Requesters to request access to information (documents, records and/or Personal Information) from KRUTHAM as contemplated under PAIA.
- 1.3 The Manual may be amended from time to time and as soon as any amendments have been effected, the latest version of the Manual will be published and distributed in accordance with PAIA.
- 1.4 A Requester is invited to contact the Information Officer should he or she require any assistance in respect of the use or content of this Manual.
- 1.5 The definitions provided in this Manual are solely for the purpose of this Manual and are not to be taken as applicable to PAIA.

2 DEFINITIONS

The following words or expressions will bear the following meanings in this Manual:

- 2.1 "**Client**" means a natural or juristic person who or which receives services from KRUTHAM ;
- 2.2 "**Data Subject**" means the natural or juristic person to whom Personal Information relates;
- 2.3 "**Employee**" means any person who works for, or provides services to or on behalf of KRUTHAM and receives or is entitled to receive remuneration;
- 2.4 "**Research Respondent**" means individuals who provide data to be analysed for the research study;
- 2.5 "**KRUTHAM**" means Krutham SA (Pty) Ltd;

- 2.6 **“Krutham UK”** means Krutham United Kingdom, KRUTHAM’s holding company;
- 2.7 **“Krutham USA”** means Krutham United States of America, a subsidiary of Krutham UK;
- 2.8 **“Information Officer”** means KRUTHAM’s designated information officer described in paragraph 5 of this Manual;
- 2.9 **“Information Regulator”** shall bear the meaning ascribed thereto in POPIA;
- 2.10 **“IT”** means information technology;
- 2.11 **“Manual”** means this manual, together with all annexures thereto as amended and made available on the website of KRUTHAM and at the offices KRUTHAM. from time to time;
- 2.12 **“PAIA”** means the Promotion of Access to Information Act No. 2 of 2000, together with any regulations published thereunder;
- 2.13 **“POPIA”** means the Protection of Personal Information Act No. 4 of 2013, together with any regulations published thereunder;
- 2.14 **“Personal Information”** has the meaning ascribed thereto under POPIA;
- 2.15 **“Processing”** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including –
- 2.15.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- 2.15.2 dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or
- 2.15.3 merging, linking, blocking, degradation, erase or destruction. For the purposes of this definition, **“Process”** has a corresponding meaning;

- 2.16 “**Requester**” means any person or entity (including any Data Subject) requesting access to a record that is under the control of KRUTHAM.; and
- 2.17 “**Third-Party**” means any independent contractor, agent, consultant, sub-contractor, an authorised service provider, or other representative of KRUTHAM.

3 **SCOPE OF THE MANUAL**

- 3.1 This Manual has been prepared in compliance with section 51 of PAIA and Regulation 4 (c), made under section 112 (2) of POPIA.
- 3.2 The purpose of this Manual is to:
- 3.2.1 provide information to those who wish to request records from KRUTHAM in terms of PAIA;
 - 3.2.2 provide information on what Personal Information KRUTHAM collects, how the Personal Information is used, who it is being shared with and how it is protected in terms of POPIA; and
- 3.3 provide Requesters with information of how to make a request for access to a record of KRUTHAM, by providing a description of the subjects on which KRUTHAM holds records and the categories of records held on each subject;
- 3.4 set out the description of the records of KRUTHAM which are available in accordance with any other legislation;
- 3.5 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 3.6 set out the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 3.7 provide Requesters with information on whether KRUTHAM will process Personal Information, the purpose of Processing of Personal Information and the description of the categories of Data Subjects and of the information or categories of information relating thereto;

- 3.8 provide Requesters with the description of the categories of Data Subjects and of the information or categories of information relating thereto;
- 3.9 set out the recipients or categories of recipients to whom the Personal Information may be supplied;
- 3.10 provide Requesters with information on whether KRUTHAM plans to transfer or Process Personal Information outside the Republic of South Africa and the recipients or categories of recipients to whom the Personal Information may be supplied; and
- 3.11 provide Requesters with information on whether KRUTHAM has appropriate security measures to ensure the confidentiality, integrity and availability of the Personal Information which is to be processed.

4 OVERVIEW OF THE FUNCTIONS OF KRUTHAM

- 4.1 KRUTHAM is a leading research and consulting firm that specialises in capital markets and financial services. Its analysis is used by investors, stockbrokers, regulators, lawyers and companies looking to understand capital markets in Africa. Its market and strategy research is used by banks, fund managers, stockbrokers, wealth managers and other financial service providers to better understand their market places.
- 4.2 KRUTHAM is a subsidiary of Krutham UK. KRUTHAM deals with all the operational matters, such as sourcing contracts, on behalf of Krutham USA and Krutham UK.

5 CONTACT DETAILS

(Information required under section 51(1)(a) of PAIA)

Name of Body:	Krutham SA (Pty) Ltd
----------------------	-----------------------------

Physical & Postal Addresses:	Physical: 1 st Floor, Building 3, Inanda Greens Office Park, 54 Wierda Road West, Sandton Postal: Postnet, Suite 18, Private Bag X9976, Sandton, 2196, Email: mail@krutham.com
Information Officer	Name: Colin Christopher Anthony T: +27 10 072 0472 E: canthony@krutham.com / mail@krutham.com
Deputy Information Officer	Name: Heidi Dietzsch T: +27 10 072 0472 E: hdietsch@krutham.com / mail@krutham.co.za

6 HOW TO USE PAIA TO ACCESS INFORMATION

(Information provided in terms of section 51(1) of PAIA)

- 6.1 PAIA grants a Requester access to records of a private body if the record is required for the exercise or protection of any rights. If a public body lodges a request in terms of PAIA, the public body must be acting in the public interest.
- 6.2 Requests in terms of PAIA shall be made in accordance with the prescribed procedures, and at the prescribed fees.
- 6.3 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“**the Guide**”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

- 6.4 The Guide is available in each of the official languages and in braille on the Information Regulator's website and/or at its offices. You may direct any queries to:

The Information Regulator of South Africa

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

E-mail: infoereg@justice.gov.za / complaints.IR@justice.gov.za

Website: <https://www.justice.gov.za/infoereg/>

Tel: 012 406 4818

Fax: 086 500 3351

- 6.5 Members of the public can also inspect copies of the Guide from the offices of KRUTHAM, during normal working hours. The Guide contains, amongst other things, a description of:

- 6.5.1 the manner and form of a request for-
- 6.5.2 access to a record of a private body contemplated in section 50¹;
- 6.5.3 the assistance available from the IO of a private body in terms of PAIA and POPIA;
- 6.5.4 the assistance available from the Regulator in terms of PAIA and POPIA; and
- 6.5.5 sets out all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging an appeal, complaint and application to the court against a decision made by an Information Officer or the Regulator.

¹ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

7 PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

(Information required under section 51(1)(c) of PAIA)

7.1 Purpose of KRUTHAM's Processing of Personal Information

7.1.1 KRUTHAM will process Personal Information only in ways that are for, or compatible with, the business purposes for which the data was collected or that are subsequently authorised by the relevant Data Subject.

7.1.2 KRUTHAM will retain Personal Information only for as long as is necessary to accomplish its legitimate business purposes or for as long as may be permitted or required by applicable law.

7.2 We use the Personal Information we collect to provide research services and/or other related services and may provide such information as a reference to market and promote our services. Please refer to the KRUTHAM Privacy Policy that can be found at: (www.krutham.com). KRUTHAM will not use the Personal Information which we collect for any purposes other than those listed in the Privacy Policy.

7.3 Categories of Data Subjects and of the Personal Information relating thereto

7.3.1 KRUTHAM collects Personal Information directly from the Data Subject and/or from Third Parties, and where KRUTHAM obtains Personal Information from Third Parties, KRUTHAM will ensure that it obtains the consent of the Data Subject to do so or will only Process the Personal Information without the Data Subject's consent where KRUTHAM is permitted to do so in terms of the applicable laws.

7.3.2 Examples of Third Parties from whom Personal Information is collected include our Clients when KRUTHAM handles Personal Information on their behalf; regulatory bodies, Research Respondents and other companies providing services to KRUTHAM and where KRUTHAM makes use of publicly available sources of information.

7.3.3 The nature or categories of the Personal Information Processed by KRUTHAM is set out below:

Categories of Data Subjects	Personal Information that may be processed
Clients	name, address, registration numbers or identity numbers, employment status and bank details.
Research Respondents	names, registration number, vat numbers, address, trade secrets and bank details.
Employees	address, qualifications, gender and race.

7.3.4 KRUTHAM may amend the above list from time-to-time.

7.4 Recipients or categories of recipients to whom Personal Information may be supplied

7.4.1 KRUTHAM may be required to disclose Personal Information in response to a court order, subpoena, civil discovery request, other legal process, or as otherwise required by law as per statutory authorities and/or the lawful order of any Court or Tribunal. We may disclose Personal Information when we believe disclosure is necessary to comply with the law or to protect the rights, property, or safety of KRUTHAM, our Clients, or others.

7.4.2 KRUTHAM will comply with POPIA before transferring Personal Information to a Third-Party who is a contractor of KRUTHAM. Before transferring Personal Information to a Third-Party, KRUTHAM will obtain assurances from the Third-Party that it will process Personal Information in a manner consistent with POPIA. Where KRUTHAM learns that a Third-Party contractor is using or disclosing Personal Information in a manner contrary to POPIA, KRUTHAM will take reasonable steps to prevent such use or disclosure.

7.5 **Planned Transborder Flows of Personal Information**

In carrying out any cross-border transfers, KRUTHAM shall adhere to the provisions of POPIA.

7.6 **Information Security Measures**

7.6.1 All data is treated on a strictly confidential basis with password-controlled security layers built into OneDrive system that restrict access on a project by project basis to those who need it.

7.6.2 We are committed to ensuring that our security measures which protect the Personal Information of Data Subjects are continuously reviewed and updated where necessary.

7.6.3 In Processing any Personal Information, KRUTHAM shall comply with the following minimum technical and organisational security requirements –

7.6.3.1 **Human Resource Security.** The suitability and background of Employees and contractors is verified, after which they are made aware of their responsibilities for information security, as well as the consequences of failing to fulfil such requirements. Termination and/or changes in roles and responsibilities initiate an immediate review of access privileges.

7.6.3.2 **Asset Management.** All company IT assets are identified, inventoried and assigned a system owner, as well as appropriate protection policies, procedures and responsibilities. All IT endpoints have endpoint protection software installed. Mission-critical and unattended assets are protected by a secure log-on procedure, restricting the use of removable media. All software is authorised. Assets are securely disposed of at the end of their lifecycle.

7.6.3.3 **Access Control.** Company systems are accessible only to authorised, authenticated persons. Access is formally authorised and periodically reviewed by each departmental data and/or system owner and enforced through mandatory access control mechanisms. Authentication information is subject to a password quality mechanism.

- 7.6.3.4 **Physical access and privileges** – KRUTHAM ensures that access to Personal Information is limited to Employees on a “need to know” basis, and KRUTHAM’s Employees are required to strictly utilise their unique user ID and applicable passwords to access same. The access to such Personal Information shall be subject to a two-step authorization/authentication process.
- 7.6.3.5 **Employee Training** – All Employees with access to Personal Information are kept up-to-date on our security and privacy practices. After a new policy is added, these Employees are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for the Personal Information of all Data Subjects.
- 7.6.3.6 **Back-ups** – KRUTHAM ensures that all Personal Information is backed-up regularly, based on operational or legal requirements, and that back up testing is conducted regularly in order to ensure that Personal Information can be recovered in the event that such Personal Information is lost, damaged or destroyed.
- 7.6.3.7 **Malware protection** – KRUTHAM ensures that its environment has comprehensive malware protection software employed, which software is specifically designed to protect KRUTHAM from the most recent malware infections.
- 7.6.3.8 **Vulnerability scanning** – KRUTHAM frequently conducts vulnerability scanning in order to assess whether Personal Information is adequately protected from external threats.
- 7.6.3.9 **Network configuration** – KRUTHAM continuously monitors all designated networks, employs intrusion detection systems and/or intrusion prevention systems, and records any security incidents.
- 7.6.3.10 **Systems Review** – KRUTHAM conducts regular reviews of its technical and organisational security measure system in order to ensure that all of the above security measures are functioning effectively and applied consistently.

8 INFORMATION HELD BY KRUTHAM IN TERMS OF PAIA

(Information required under section 51(1)(e) of PAIA)

8.1 This section of the Manual sets out the categories and descriptions of records held by KRUTHAM. The inclusion of any category of records should not be taken to mean that records falling within that category will be made available under PAIA. In particular, certain grounds of refusal as set out in PAIA may be applicable to a request for such records.

8.2 **Company records**

All company records and official documents are kept in a secure, password-protected environment with access only to those who need it, including:

- 8.2.1 Company registration documents;
- 8.2.2 Memorandum of Incorporation;
- 8.2.3 Licenses;
- 8.2.4 Licensing and franchising agreements;
- 8.2.5 Certification, professional qualifications and registration.

8.3 **Accounting records**

- 8.3.1 Details of accounting officer or auditors;
- 8.3.2 Formal books of account and financial statements;
- 8.3.3 Banking records;
- 8.3.4 Management reports; and
- 8.3.5 Company tax returns.

8.4 **Customer records**

Financial Intelligence Centre Act 38 of 2001 (“**FICA**”) onboarding (KYC) documents;

8.5 Human Resources records

8.5.1 Employee policies;

8.5.2 Pension funds;

8.5.3 Recruitment;

8.5.4 Health and safety documentation; and

8.5.5 Workplace Skills Plans (WSP).

8.6 Operations records

8.6.1 Asset register; and

8.6.2 Corporate social investment / charity / B-BBEE work done.

8.7 Marketing

8.7.1 Website; and

8.7.2 Marketing materials.

8.8 Policies

8.8.1 Data governance policies;

8.8.2 Company sustainability policy;

8.8.3 Company conflict of interest policy;

8.8.4 Staff securities trading policy; and

8.8.5 Company policies on study leave, maternity/paternity leave, work from home.

9 INFORMATION KEPT IN ACCORDANCE WITH OTHER LEGISLATION

(Information required under section 51(1)(b)(iii) of PAIA)

9.1 Records are kept in accordance with legislation applicable to KRUTHAM which includes, but is not limited to, the following:

- 9.1.1 Basic Conditions of Employment Act 75 of 1997
- 9.1.2 Companies Act 71 of 2008
- 9.1.3 Constitution of the Republic of South Africa, 1996
- 9.1.4 Consumer Protection Act 68 of 2008
- 9.1.5 Electronic Communications and Transactions Act 25 of 2002
- 9.1.6 Employment Equity Act 55 of 1998
- 9.1.7 Financial Intelligence Centre Act 38 of 2001
- 9.1.8 Income Tax Act 58 of 1962
- 9.1.9 Labour Relations Act 66 of 1995
- 9.1.10 Occupational Health and Safety Act 85 of 1993
- 9.1.11 Promotion of Access to Information Act 2 of 2000
- 9.1.12 Protection of Personal Information Act 4 of 2013
- 9.1.13 Skills Development Act 97 of 1998
- 9.1.14 Value Added Tax Act 89 of 1991

10 REQUEST PROCEDURES

10.1 Records, whether specifically listed in this Manual or not, will only be made available subject to the provisions of PAIA.

10.2 Form of request

10.2.1 The Requester must use the prescribed form to make the request for access to a record, which form is attached hereto as Annexure "A". This must be made to the Information Officer at the address or electronic mail address of the body concerned (*see s 53(1) of PAIA*).

10.2.2 The Requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the Requester. The Requester should also indicate which form of access is required and specify a postal address, fax number in the Republic or email address. The Requester should also indicate if, in addition to a written reply, any other manner is to be used to inform the Requester and state the necessary particulars to be so informed (*see s 53(2)(a) and (b) and (c) and (e) of PAIA*).

10.2.3 The Requester must identify the right that is sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right (*see s 53(2)(d) of PAIA*).

10.2.4 If a request is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the satisfaction of the head of the private body (*See s 53(2)(f) of PAIA*).

10.3 Fees

10.3.1 Request fees:

10.3.1.1 The Information Officer must by notice require the Requester to pay the prescribed request fee (if any) before further processing the request (*see s 54(1) of PAIA*).

10.3.1.2 The fee that the Requester must pay to a private body is [R140]. The Requester may lodge an application to the court against the tender or payment of the request fee (*See section 54(3)(b) of PAIA*).

10.3.1.3 The Information Officer must by notice require the Requester to pay the prescribed request fee (if any) before further processing the request (*see s 54(1) of PAIA*).

10.3.1.4 The fee that the Requester must pay to a private body is [R140]. The Requester may lodge an application to the court against the tender or payment of the request fee (*See section 54(3)(b) of PAIA*).

10.3.2 Access fees and fees for reproduction:

10.3.2.1 If access to a record/s is granted by KRUTHAM, the Requester may be required to pay an access fee for the search for and preparation of the records and for re-production of the record/s.

10.3.2.2 The access fees which apply are set out below. KRUTHAM can refuse access until such the applicable fees have been paid.

	Reproduction	Fee (Rand)
1.	Photocopy of an A4-size page or part thereof provided in hard copy or via scanned copy sent via email.	R2.50 per page
2.	Printed copy of an A4-size page or part thereof held on a computer or in electronic or machine readable form.	R2.50 per page

3.	A copy of, in a computer readable form on compact disc.	R60.00
4.	Transcription of visual images on an A4-size page or part thereof.	Subject to the actual cost of transcription
5.	Copy of visual images	R60.00
6.	Transcription of an audio record on an A4-size page or part thereof.	Subject to the actual cost of transcription.
7.	Copy of an audio record	R30.00

10.4 **Decision on request**

10.4.1 After the Information Officer has made a decision on the request, the Requester will be notified using the required form.

10.4.2 If the request is granted then a further access fee must be paid for reproduction and for search and preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure (*see s 54(6) of PAIA*).

11 **TIMELINES FOR CONSIDERATION OF A REQUEST**

11.1 Requests for access by a Requestor will be processed within 30 days, unless the request contains considerations that are of such a nature that an extension of the 30-day time limit is necessary. Such considerations include –

- 11.1.1 where the request is for a large number of records or requires a search through a large number of records (including where records that have been archived electronically need to be restored);
 - 11.1.2 where the request requires a search for records in, or collection of such records from, an office of KRUTHAM located far away from Sandton, Johannesburg ;
 - 11.1.3 consulting KRUTHAM with another private body is necessary or desirable to decide upon the request that cannot reasonably be completed within the original 30-day period;
 - 11.1.4 more than one of the circumstances contemplated in paragraphs 11.1.1, 11.1.2 and 11.1.3, exist in respect of the request making compliance with the original period not reasonably possible; or
 - 11.1.5 the Requester consents in writing to such extension.
- 11.2 If an extension is necessary, you will be notified with reasons for the extension. If the Information Officer fails to communicate a decision on a request, such a request is then deemed to have been refused.

12 GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

- 12.1 Requests for access by a Requestor must be refused by the Information Officer if–
 - 12.1.1 the disclosure would involve the unreasonable disclosure of personal information about a third party (natural person), including a deceased individual (*see section 63 of PAIA*);
 - 12.1.2 the record contains (a) trade secrets of a third party, (b) financial, commercial, scientific or technical information, other than trade secrets, of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party, or (c) information supplied in confidence by a third party the disclosure of which could reasonably be expected to put that third party at a disadvantage in contractual or other negotiations; or to prejudice that third party in commercial competition (*see section 64 of PAIA*);

- 12.1.3 the disclosure of the record would constitute an action for breach of a duty of confidence owed to a third party in terms of an agreement (see section 65 of PAIA);
 - 12.1.4 the disclosure could reasonably be expected to endanger the life or physical safety of an individual (*see section 66(a) of PAIA*);
 - 12.1.5 the record is privileged from production in legal proceedings unless the person entitled to the privilege has waived the privilege (*see section 67 of PAIA*); or
 - 12.1.6 the record contains information about research being or to be carried out by or on behalf of a third party, the disclosure of which would be likely to expose: (a) the third party; (b) a person that is or will be carrying out the research on behalf of the third party; or (c) the subject matter of the research, to serious disadvantage (*see section 69 of PAIA*).
- 12.2 Requests for access by a Requestor may be refused by the Information Officer if–
- 12.2.1 the disclosure would be likely to prejudice or impair: (i) the security of: (aa) a building, structure or system, including, but not limited to, a computer or communication system; (bb) a means of transport; or (cc) any other property; or (ii) methods, systems, plans or procedures for the protection of: (aa) an individual in accordance with a witness protection scheme; (bb) the safety of the public, or any part of the public; or (cc) the security of property contemplated in subparagraph (i) (aa), (bb) or (cc) (*see section 66(b)*);
 - 12.2.2 the record:
 - (a) contains trade secrets of KRUTHAM;
 - (b) contains financial, commercial, scientific or technical information, other than trade secrets, the disclosure of which would be likely to cause harm to the commercial or financial interests of KRUTHAM;
 - (c) contains information, the disclosure of which could reasonably be expected:

(i) to put KRUTHAM at a disadvantage in contractual or other negotiations; or

(ii) to prejudice KRUTHAM in commercial competition; or

(d) is a computer program, as defined in section 1(1) of the Copyright Act No. 98 of 1978, owned by KRUTHAM except insofar as it is required to give access to a record to which access is granted in terms of PAIA; or

12.2.3 the record contains information about research being or to be carried out by or on behalf of KRUTHAM, the disclosure of which would be likely to expose: (a) KRUTHAM; (b) a person that is or will be carrying out the research on behalf of KRUTHAM; or (c) the subject matter of the research, to serious disadvantage.

13 REMEDIES AVAILABLE TO A REQUESTOR ON REFUSAL OF ACCESS

13.1 KRUTHAM does not have any internal appeal procedures that may be followed once a request to access information has been refused.

13.2 The decision of the Information Officer or deputy information officer is final.

13.3 If you are not satisfied with the outcome of your request, you are entitled approach the Regulator or apply to a court of competent jurisdiction to take the matter further.

14 OTHER INFORMATION HELD BY KRUTHAM AS PRESCRIBED

(Other information as may be prescribed under section 51(1)(a)(ii))

The Minister of Justice and Constitutional Development has to date not made any regulations regarding disclosure of other information.

15 AVAILABILITY OF THE MANUAL

(Availability of Manual under section 51(3))

15.1 This Manual is available for inspection by the general public upon request, during office hours and free of charge, at the offices of KRUTHAM. Copies of the Manual may be made, subject to the prescribed fees.

15.2 The Manual is also posted on KRUTHAM's website referred to above.

Issued by:

Krutham SA (Pty) Ltd

22 November 2021

FORM C

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act 2000 (Act No. 2 of 2000))

[Regulation 10]

A. Particulars of public body

The Head:

B. Particulars of person requesting access to the record

- | |
|---|
| <p>(a) <i>The particulars of the person who requests access to the record must be recorded below.</i></p> <p>(b) <i>The address and/or fax number in the Republic to which information must be sent.</i></p> <p>(c) <i>Proof of the capacity in which the request has been made, if applicable, must be attached.</i></p> |
|---|

Full names and surname: _____

Identity number: _____

Postal address: _____

_____ Fax number: _____

Telephone number: _____ E-mail: _____

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person

Full names and surname: _____

Identity number: _____

D. Particulars of record

(a) *Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.*

(b) *If the provided space is inadequate please continue on a separate folio and attach it to this form. **The requester must sign all the additional folios.***

1 Description of the record or relevant part of the record: _____

2 Reference number, if available: _____

3 Any further particulars of the record:

E. Fees

- (a) A request for access to a record other than a record, other than a record containing personal information about yourself, will be processed only after a **request fee** has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (c) The **fee payable for the access** to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- (d) If you qualify for the exemption of the payment of any fee, please state the reason for exemption.

Reason for the exemption from payment of fees: _____

F. Form of access to record

If you are prevented by disability to read, view of or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:

Mark the appropriate box with an **X**.

NOTES:

- (a) Compliance with your request for access in the specified form may depend on the form in which the record is available.
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- (c) The fee payable for the access to the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If the record consists of visual images- (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	YES	NO
---	-----	----

G. Particulars of right to be exercised or protected

*If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The requester must sign all the additional folios.***

- Indicate which right is to be exercised or protected: _____

- Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this ____ day of _____.

SIGNATURE OF REQUESTER / PERSON ON
WHOSE BEHALF REQUEST IS MADE